

ANNA P. PEREIRA
CORPORATION COUNSEL
920 Broad Street, Room 316
Newark, New Jersey 07102
Attorney for Defendants City of Newark (Improperly pled as "City of
Newark Police Dept.", Former Police Chief Campos, Officer Smith,
Officer Alvarado, Officer Nieves and Sgt. Venancio

By: Avion M. Benjamin (AB-5629)
Assistant Corporation Counsel
(973) 733-3880

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

MARK STEVENS,

Plaintiff,

v.

CITY OF NEWARK POLICE
DEPARTMENT, and in both their
individual and professional
capacity POLICE OFFICER SILAS
SMITH, JR., POLICE OFFICER
CARLOS ALVARADO, POLICE
OFFICER ANTHONY VENANCIO,
POLICE OFFICER NEIVES, POLICE
CHIEF ANTHONY CAMPOS, ABC
CORPS 1-20 (said names being
fictitious), JOHN DOES 1-20
(said names being fictitious)

Defendants.

:
: CIVIL ACTION NO. 09-1279 (PGS)
:

:
: NOTICE OF MOTION FOR
: SUMMARY JUDGMENT

TO: Andrew R. Bronsnick, Esq.
Joseph A. Massood
50 Packanack Lake Road East
Wayne, New Jersey 07470

COUNSEL:

PLEASE TAKE NOTICE that on a date and time to be fixed by the
Court, the undersigned shall apply to the United States District
Court for the District of New Jersey for an Order for Summary

Judgment pursuant to Fed. R. Civ. P. 56 as a matter of law in favor of the Defendants; and

TAKE FURTHER NOTICE, that the Defendants shall rely upon the annexed Declaration and Brief; and

TAKE FURTHER NOTICE, that oral argument is requested if opposition is filed; and

TAKE FURTHER NOTICE, that a proposed Form of Order is attached.

ANNA P. PEREIRA
CORPORATION COUNSEL
ATTORNEYS FOR DEFENDANTS
BY: /s/ Avion M. Benjamin
AVION M. BENJAMIN
ASSISTANT CORPORATION COUNSEL

DATE: MAY 9, 2011

DECLARATION OF SERVICE

On May 9, 2011, I, Avion M. Benjamin, Assistant Corporation Counsel caused to be served the within motion papers and supporting documents via electronic service upon the Court and all counsel of record:

Andrew R. Bronsnick, Esq.
Joseph A. Massood
50 Packanack Lake Road East
Wayne, New Jersey 07470

I **HEREBY** declare and affirm that to the best of my knowledge the foregoing statements are true. I am aware that if such statements are willfully false, I am subject to punishment.

ANNA P. PEREIRA
CORPORATION COUNSEL
ATTORNEYS FOR DEFENDANTS

BY: /s/Avion M. Benjamin
AVION M. BENJAMIN (AB5629)
ASSISTANT CORPORATION COUNSEL